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August 28, 2019

By ECF

The Honorable Anne Y. Shields
United States Federal Courthouse
100 Federal Plaza
Central Islip, New York 11722

Re: *Cary Scott Goldinger and Law Office of Cary Scott
Goldinger, P.C. v. Hanover Insurance Company,*
Index No. 2:19-cv-02232

Dear Judge Shields:

As you are aware, this firm represents Plaintiffs Cary Scott Goldinger and the Law Office of Cary Scott Goldinger (collectively, "Goldinger") in the above-referenced action. We write in furtherance of your Order dated August 13, 2019 requiring the parties to provide an update regarding ongoing efforts to resolve the instant litigation.

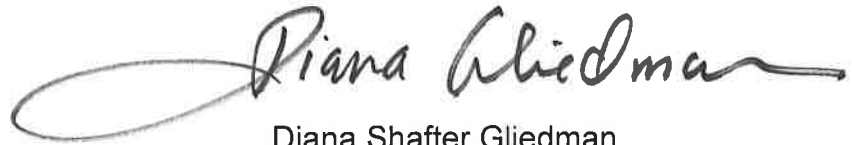
Goldinger and Defendant Hanover Insurance Company ("Hanover") attended a global mediation on August 14, 2019 which involved parties to the above-referenced coverage action (the "Coverage Action") as well as the underlying legal malpractice action entitled *Marilyn Klugman Trust, by Ilene Klugman Ampel, as trustee, Ilene Klugman Ampel, in her individual capacity, and Kenneth Ampel v. Cary Scott Goldinger and Natalie Elisha*, Index Number 716769/2018 (the "Underlying Action"). At the mediation, all of the parties were able to agree upon a global settlement in principle (including the parties to the above-referenced coverage action). The proposed settlement, however, cannot be finalized until the plaintiff to the Underlying Action obtains (1) releases from third parties and (2) letters of administration on behalf of plaintiff Ilene Klugman Ampel's estate.

Hanover and Goldinger hope and fully expect that the plaintiff to the Underlying Action is or will be obtaining these documents in the near future. As such, Hanover and Goldinger request a further stay of discovery in order to fully resolve the pending litigation.

June 18, 2019
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The parties will continue to keep the Court abreast of its efforts.

Respectfully submitted,

A handwritten signature in black ink, reading "Diana Shafter Gliedman". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.

Diana Shafter Gliedman